



**NORTH DAKOTA**  
DEPARTMENT of HEALTH

ENVIRONMENTAL HEALTH SECTION  
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May 8, 2007

**FILE**

Ms. Abbie Krebsbach  
Environmental Manager  
Montana Dakota Utilities  
400 N Fourth Street  
Bismarck, ND 58501

Re: Heskett Unit 2 BART Applicability

Dear Ms. Krebsbach:

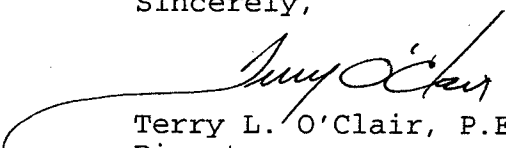
The Department has reviewed the modeling analysis for the Heskett Station Unit 2 that was submitted June 9, 2006. The modeling analysis was conducted to determine the effect Unit 2 has on visibility in the Class I areas of North Dakota. This modeling analysis indicates that Unit 2 has an impact on visibility impairment of less than 0.5 deciviews.

On December 12, 2006, the Department and Montana Dakota Utilities (MDU) met to discuss the modeling analysis and proposed sulfur dioxide reductions at Heskett Unit 2. On December 27, 2006 we received a letter from MDU which outlined commitments stated at the December 12, 2006 meeting. From that meeting and the letter, it is the Department's understanding that MDU has committed to reduce sulfur dioxide emissions from Heskett Unit 2 by at least 70% on a 30-day rolling average basis (coal-to-stack) by the end of 2013. In addition, it is our understanding that Montana-Dakota Utilities has committed to conduct an optimization study to determine the removal efficiency due to limestone injection into the bed. The optimization study will be utilized to determine an enforceable reduction efficiency for Heskett Station Unit 2; however, removal efficiency shall not be less than 70%.

Based on the results of the modeling analysis and our understanding of Montana Dakota Utilities commitments regarding sulfur dioxide control from Heskett Unit 2, the Department has determined that Best Available Retrofit Technology (BART) requirements are not applicable to Heskett Unit 2.

If you have any questions, please feel free to contact me.

Sincerely,

  
Terry L. O'Clair, P.E.  
Director  
Division of Air Quality

TLO/TAB:saj

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